

ERIC G. MOSKOWITZ
NANCY E. KESSLER PLATT
DAWN L. GOLDSTEIN
National Labor Relations Board
1099 14th Street, NW, Suite 8600
Washington, DC 20570
Telephone: 202 273-2930
Facsimile: 202 273-1799
Email: Eric.Moskowitz@nlrb.gov
Email: Nancy.Platt@nlrb.gov
Email: Dawn.Goldstein@nlrb.gov

OLIVIA GARCIA
KATHLEEN C. SCHNEIDER, Bar No. 174058
NLRB, Region 20
901 Market Street, Suite 400
San Francisco, CA 94103-1735
Telephone: 415 356-5130
Facsimile: 415 356-5156
Email: Olivia.Garcia@nlrb.gov
Email: Kathleen.Schneider@nlrb.gov

Counsel for Defendants Norelli, et al.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SERVICE EMPLOYEES INTERNATIONAL)
UNION, Local 790,)
Plaintiff,) [PROPOSED] ORDER
v.) SHORTENING TIME AND
Defendants.) SETTING HEARING FOR
Time: 9:00 A.M.
Date: June 27, 2007
Judge: Hon. Phyllis J. Hamilton
Courtroom: #3, 17th Floor

1 Plaintiff Service Employees International Union, Local 790, and Defendants Joseph
2 Norelli, Regional Director for Region 20 of the National Labor Relations Board and the
3 individual Members of the National Labor Relations Board (collectively, "the Board" or "the
4 NLRB"), by and through their respective undersigned counsel, pursuant to Local Rule 6-2,
5 N.D.Cal., hereby STIPULATE AND AGREE as follows:

6 1. This Court has issued an Order to Show Cause regarding Plaintiff's Motion for a
7 Preliminary Injunction, and set a hearing on that Motion for June 27, 2007, at 9:00 a.m (Docket
8 No. 18). The Board has opposed Plaintiff's Motion for Preliminary Injunction on grounds of
9 lack of subject matter jurisdiction (Docket No. 14). For this same reason - lack of jurisdiction -
10 the Board is filing the accompanying Motion to Dismiss Complaint. Thus, it will serve the
11 interests of judicial economy and the economy of the parties (particularly the Board, whose lead
12 counsel is in Washington, D.C.) to have the Motion to Dismiss heard at the same time as the
13 Motion for Preliminary Injunction.

14 2. Plaintiff's Opposition to the Board's Motion to Dismiss will be filed by June 13, 2007,
15 and the NLRB's Reply will be filed by June 20, 2007.

16 3. One previous time modification has been sought in this case. Proposed Intervenor
17 Stephen J. Burke, Jr., has filed a Motion to Shorten Time (Docket No. 19), in order that his
18 intervention motion may also be heard on June 27, 2007. Proposed Intervenor Burke has also
19 agreed to the briefing and hearing dates set out in this stipulation.

20 4. The Court has issued an order setting the case management conference for September
21 6, 2007 (Docket No. 21). The requested time modification would therefore have no effect on the
22 schedule for this case.

1
2
3 /s/ David A. Rosenfeld
 VINCENT A. HARRINGTON, JR., Bar No. 071119
 DAVID A. ROSENFELD, Bar No. 058163
 ERIC M. BORGERSOHN, Bar No. 177943
 WEINBERG, ROGER & ROSENFELD
 1001 Marina Village Parkway, Ste. 200
 Alameda, CA 94501-1091
 Tel: (510) 337-1001
 Fax: (510) 337-1023

4
5
6
7
8
9 Counsel for Plaintiff SEIU, Local 790

10 Dated: June 6, 2007

11
12 ERIC G. MOSKOWITZ
 Assistant General Counsel
 National Labor Relations Board
 Special Litigation Branch
 1099 14th Street, NW
 Washington, DC 20570
 Tel: (202) 273-2930
 Fax: (202) 273-1799

13
14 /s/Nancy E. Kessler Platt
 NANCY E. KESSLER PLATT
 Supervisory Attorney

15
16 DAWN L. GOLDSTEIN
 Senior Attorney
 Tel: (202) 273-2936

17
18 OLIVIA GARCIA
 Regional Attorney
 National Labor Relations Board –
 Region 20
 901 Market Street, Suite 400
 San Francisco, CA 94103
 Tel: (415) 356-5151
 Fax: (415) 356-5156

19
20 KATHLEEN C. SCHNEIDER No.
 174058
 Attorney – Region 20
 Tel: (415) 356-5157

21 PURSUANT TO STIPULATION, IT IS SO
 ORDERED.

22 Dated: 6/25/07

23
24 Hon. Phyllis J. Hamilton
 United States District Court

25 Counsel for Defendants Norelli, et al.

Dated: June 6, 2007

